UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA ABINGDON DIVISION

UNITED STATES OF AMERICA

.

v. : Case No. 1:23CR6

:

RALPH THOMAS REACH : In violation of 21 U.S.C. §§ 331(k),

333(a)(1), and 353(b)(1)

INFORMATION (MISDEMEANORS)

COUNT ONE

The United States Attorney charges that:

- 1. During the relevant time periods of this information, RALPH THOMAS REACH was an owner of and practiced as a physician at Watauga Recovery Centers at various locations in the Western District of Virginia and Northeast Tennessee.
- 2. On or about the dates set forth below, in the Western District of Virginia and elsewhere, RALPH THOMAS REACH induced the below-listed prescription drugs (Schedule III controlled substances) to be dispensed without valid prescriptions by the actions of health care providers at Watauga Recovery Centers, resulting in the drugs being misbranded while held for sale after shipment in interstate commerce:

DATE	PATIENT	DRUG	QUANTITY
1/11/2017	T.C.	Subutex	28
2/15/2017	T.C.	Subutex	42
3/20/2017	C.E.	Suboxone	28
3/20/2017	H.R.	Suboxone	28
5/10/2017	T.C.	Suboxone	42
5/31/2017	T.C.	Suboxone	42
6/19/2017	T.C.	Suboxone	14
7/19/2017	T.C.	Suboxone	28
8/16/2017	T.C.	Suboxone	14
8/23/2017	T.C.	Suboxone	28
11/29/2017	T.C.	Suboxone	56

3. All in violation of Title 21, United States Code, Sections 331(k), 333(a)(1), and 353(b)(1) and Title 18, United States Code, Section 2.

COUNT TWO

The United States Attorney charges that:

- 1. During the relevant time periods of this information, RALPH THOMAS REACH was an owner of and practiced as a physician at Watauga Recovery Centers at various locations in the Western District of Virginia and Northeast Tennessee.
- 2. From on or about January 1, 2015, through on or May 1, 2018, on occasions different from those set forth in Count One of this Information and Count One of an Information filed in Case No. 1:21CR23, in the Western District of Virginia and elsewhere, RALPH THOMAS REACH induced various quantities of prescription drugs clonazepam (Schedule IV controlled substance) and gabapentin to be dispensed without valid prescriptions by the actions of health care providers at Watauga Recovery Centers, resulting in the drugs being misbranded while held for sale after shipment in interstate commerce.

3. All in violation of Title 21, United States Code, Sections 331(k), 333(a)(1), and 353(b)(1) and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

- 1. Upon conviction of the offenses alleged in this Information, RALPH THOMAS REACH shall forfeit to the United States various prescription drugs that became misbranded as a result of his conduct, pursuant to 21 U.S.C. § 334 and 28 U.S.C. § 2461.
- 2. Because the above-described forfeitable property has been transferred and sold to third parties and cannot be located upon the exercise of due diligence, the United States intends to seek forfeiture of \$50,000 (fifty thousand dollars); pursuant to 21 U.S.C. § 853(p).

DATED: March 29, 2023.

CHRISTOPHER R. KAVANAUGH United States Attorney

Randy Ramseyer for